

1 STEVEN G. KALAR
2 Federal Public Defender
3 JOHN PAUL REICHMUTH
Assistant Federal Public Defender
3 555 - 12th Street, Suite 650
Oakland, CA 94607-3627
4 Telephone: (510) 637-3500

5 Counsel for Defendant ALONSO

6

7

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,)
11 Plaintiff,) No. CR 14-00146-JST
12 vs.) STIPULATION TO CONTINUE;
13 ARMANDO ALONSO,) [PROPOSED] ORDER CONTINUING
14 Defendant.) CASE AND EXCLUDING TIME UNDER
15) THE SPEEDY TRIAL ACT

16 IT IS HEREBY STIPULATED, by and between the parties to this action, that the
17 STATUS HEARING date of June 6, 2014 presently scheduled at 9:30 a.m., before the
18 Honorable John S. Tigar, be vacated and re-set for July 25, 2014 at 9:30 a.m. for CHANGE OF
19 PLEA.

20 The reason for this request is that defense counsel is continuing to review, organize, and
21 investigate discovery in this case. The government is currently assessing its position with regard
22 to a certain Sentencing Guideline issue which will be relevant to Mr. Alonso's decision whether
23 or not to resolve this case by plea. It is not anticipated that that review can be completed by June
24 13, 2014. The next available change of plea date is July 25, 2014. If Mr. Alonso decides not to
25 settle the case at the next appearance, the parties will advise the court promptly.
26

1 The parties agree and stipulate that the time until July 25, 2014 should be excluded, under
2 18 U.S.C. §3161(H)(7)(A) and (B)(iv), because the ends of justice served by the granting of the
3 continuance outweigh the bests interests of the public and the defendant in a speedy and public
4 trial. The continuance is necessary to accommodate both counsels' preparation efforts.

5

6

Date 06/04/14

/s/

John Paul Reichmuth
Assistant Federal Public Defender
Counsel for defendant BLUE

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

/s/

Katie Madearis
Assistant United States Attorney

1 ORDER

2 The court finds that the ends of justice served by the granting of the continuance
3 outweigh the bests interests of the public and the defendant in a speedy and public trial. The
4 continuance is necessary to accommodate both counsels' preparation efforts including the
5 review, organization, and investigation of discovery. Based on these findings, IT IS HEREBY
6 ORDERED THAT the above-captioned matter be continued to July 25, 2014 at 9:30 a.m., and
7 that time be excluded from the date of this order to July 25, 2014 pursuant to 18 U.S.C.
8 §§3161(h)(7)(A) and (B)(iv).

9

10 IT IS SO ORDERED.

11

12

13 June 5, 2014 _____

14 Date

15

16

17

18

19

20

21

22

23

24

25

26

